

Pleadings\Br\Gay E. Anderson\Final Cure\Extend Time - Amended Motion.Pg.1

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

IN THE MATTER OF:

GAY E. ANDERSON,  
  
Debtor

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No. 07 B 24132  
Chapter 13  
Judge BRUCE W. BLACK

NOTICE OF MOTION

TO: Glenn B. Stearns, Chapter 13 Trustee, 4343 Commerce Court - Suite L Lisle,  
Illinois 60532-0586

Toni Dillon, Esq., Pierce & Associates, 1 N. Dearborn #1300,  
Chicago IL 60602

Kevin A. Ameriks, Esq., Bridgeview Bank Group, 4753 N. Broadway, Chicago IL  
60640

PLEASE TAKE NOTICE that on May 3, 2013 at 10:00 a.m. or as soon thereafter as  
counsel may be heard, I shall appear before the Honorable Judge **BRUCE W. BLACK** or any  
Judge sitting in said Judge's place, Joliet City Hall, 150 West Jefferson St.-2nd Floor, Joliet,  
Illinois.

I shall then and there present an Amended Motion Extend Time for Filing Objection to  
Statement in Response Notice of Payment of Final Mortgage Cure Amount, a copy of which is  
attached hereto, and request the relief sought therein. You may appear at that time if you so  
choose.

/s/ James G. Uzzell  
Attorney for Debtor

James G. Uzzell  
39 S. LaSalle Street - Suite 725  
(312) 782-4787

Chicago, Illinois 60603-1998  
A.R.D.C. No. 02880857

PROOF OF SERVICE

I, JAMES G. UZZELL, an attorney, certify that I served this notice on each above  
party by transmitting same via the Court's ECF System on April 16, 2013.

/s/ James G. Uzzell

Pleadings\Br\Gay E. Anderson\Final Cure\Extend Time.Pg.3

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

IN THE MATTER OF:

GAY E. ANDERSON,  
Debtor

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No. 07 B 24132  
Chapter 13  
Judge BRUCE W. BLACK

AMENDED MOTION TO EXTEND TIME FOR FILING  
OBJECTION TO STATEMENT IN RESPONSE TO NOTICE  
OF PAYMENT OF FINAL MORTGAGE CURE AMOUNT

Debtor GAY E. ANDERSON, by her attorney, James G. Uzzell, moves the Court to extend time for her to file her objection to the statement of Bridgeview Bank in response to the Trustee's Notice of Payment of Final Cure amount, as follow:

1. In January, 2013, Debtor completed her payments under her Chapter 13 Plan. On February 28, 2013, the Trustee filed a Notice of Final Cure Payment as to Bridgeview Bank ("Bank") On March 21, 2013, Bank filed a Statement in response to Notice of Final Cure Payment asserting a post-petition delinquency of over \$6500, representing loan interest after December 1, 2011.

2. Debtor has grave doubts as to the accuracy of Bank's assertion.

3. Debtor requested a payment history. Bank refused to provide one. Why? Is Bank trying to gain a litigation advantage by imposing extra work on Debtor and her counsel when the Plan is complete and no fees are available?

4. Debtor has requested five years of checking account statements from her depository bank. They have not arrived yet. Debtor therefore needs more time to

gather the facts and respond to Bank's claims.

WHEREFORE, Debtor moves the Court to extend the time for filing an Objection under Rule 30002(h) to and including May 24, 2013. Debtor also requests such other relief as the Court deems just.

Respectfully submitted,

/s/ James G. Uzzell  
Attorney for Debtor

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